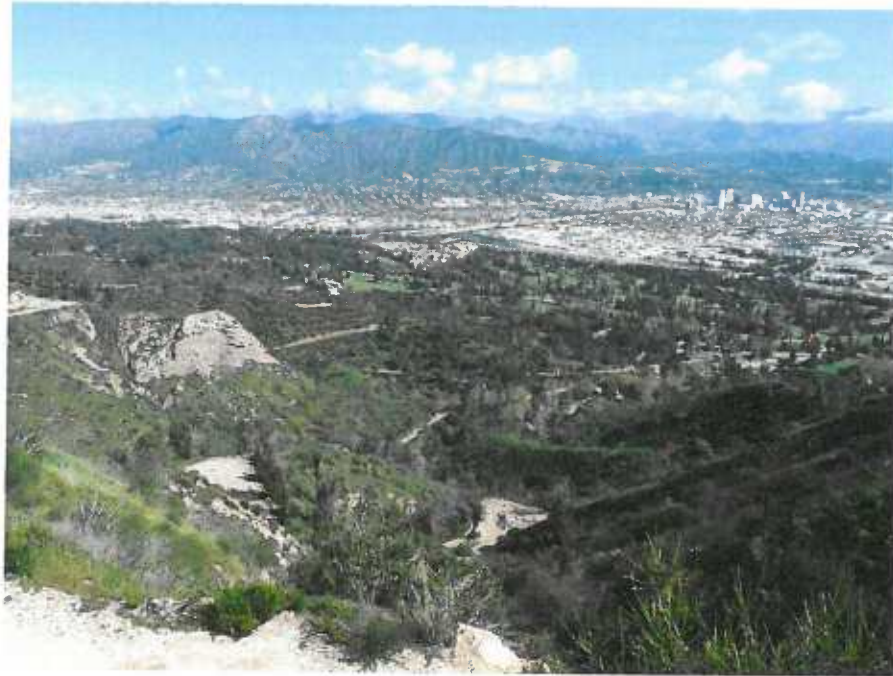


ATTACHMENT 1

Wildlife of Old Zoo, Griffith Park
Los Angeles, California

FINAL



View northeast of Spring Canyon (Old Zoo is just below center of photo)
D. Cooper, March 2010

Prepared for:

Friends of Griffith Park

by:

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July 30, 2014

SUMMARY

We report on the wildlife of Old Zoo, Griffith Park, the site of a proposed outdoor amphitheater set within a significant natural area, lower Spring Canyon. Since 2007, the Griffith Park Natural History Survey has been conducting surveys of plants and wildlife in the park, and in spring 2014, additional visits focusing on birds of the Old Zoo area were conducted. Data on birds is also available from online sources (e.g., www.eBird.org) which were also consulted. From these data, we find that the Old Zoo area may support at least two California Native Plant Society (CNPS) rare plants, is directly adjacent to areas with very high plant diversity, supports some of the highest bat diversity in the park and, likely, in the eastern Santa Monica Mountains), is a known usage area for both bobcat and gray fox, and includes breeding habitat for around 40 species of native birds (see below), including three raptors (Red-tailed Hawk, Cooper's Hawk and Great Horned Owl). Like other heavily used areas of the park where natural communities have been altered, the immediate Old Zoo site is lacking in certain resident scrubland birds and other wildlife that are readily found just outside its borders; however, many woodland species utilize the oaks and other tree species at Old Zoo, and it remains a rich and productive area for the park's wildlife. This represents the first analysis of the fauna of the Old Zoo.

INTRODUCTION

Griffith Park is one of the largest and oldest parks in the U.S., and was dedicated as a Historic-Cultural Monument by the city of Los Angeles (by a 15-0 vote) on January 27, 2009. It protects a large percentage of the open space in the eastern Santa Monica Mountains. Also, most of Griffith Park has been designated a "Sensitive Environmental Area" by the Los Angeles County Department of Regional Planning since the early 1980s. Located on the eastern flank of the park, the "Old Zoo" operated as the Griffith Park Zoo between 1912 and 1966, when the much larger (and current) Los Angeles Zoo was opened a short distance to the north, also within the park's borders (Figure 1). Today, remnants of the Old Zoo include the cement enclosures built into the hillsides, some still with original iron bars, as well as the large, circular grassy area in the center of the zoo site that is now used as an occasional picnic and rest area for park visitors. Access to the lawn and old animal enclosures is via a short but steep walk up a pathway from a lower picnic area. A paved access road, also used as a parking lot, extends west from Griffith Park Dr. to approach the eastern edge of the Old Zoo site, ending at the start of a paved footpath running uphill to the main lawn. All of the Old Zoo area falls within the "wilderness area" per the Historic-Cultural Monument.

In early 2012, the city began discussing plans for a major stage to be constructed at the Old Zoo site. According to the prepared Mitigated Negative Declaration (MND) obtained by community groups, the project would be implemented in phases. In addition to the stage and a backstage within the picnic area itself, the project description includes night lighting, sound amplification, and other potential disturbance. In order to accommodate American Disability Act (ADA) standards, a 4-section bridge would be constructed, along with ADA pathways connecting it to the stage and audience areas. Parking lot improvements, lighted pathways and rest room upgrades are also planned. Per the MND, only conceptual designs are available.

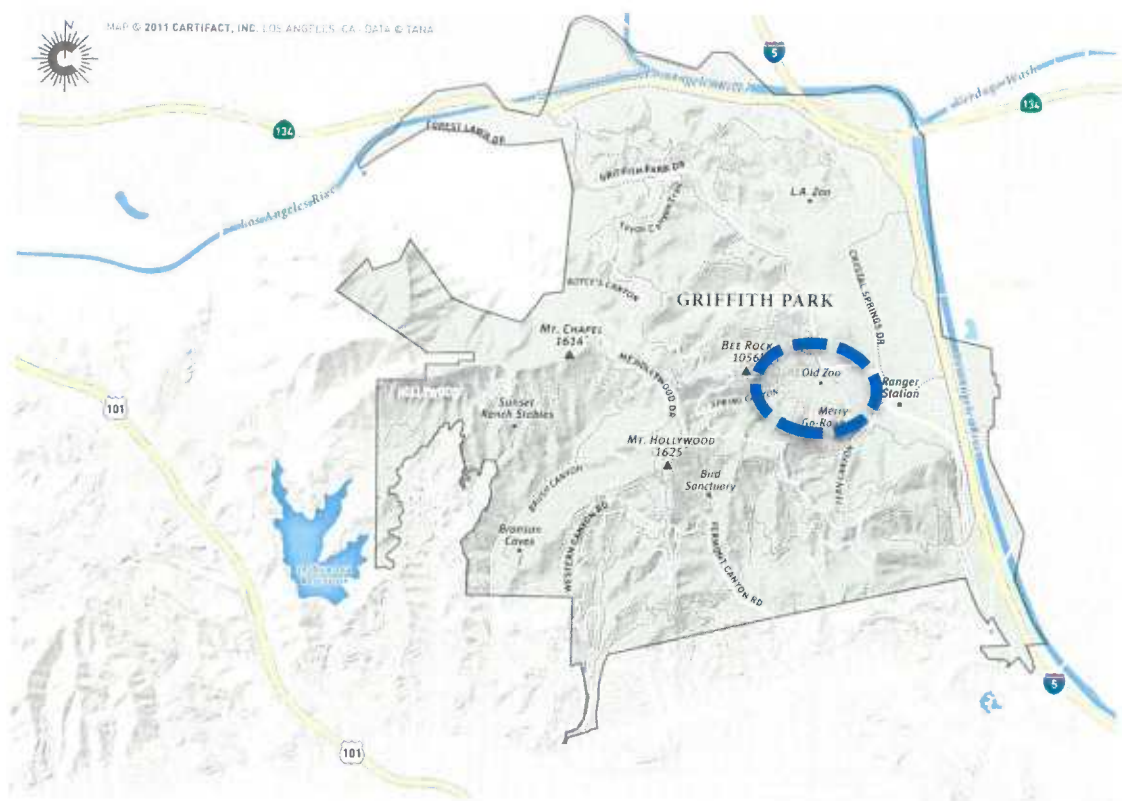


Figure 1. Relief map of Griffith Park, showing general location of Old Zoo (blue dashed oval). Map courtesy of Cartifact, Inc.

Natural Setting

The Old Zoo area represents the lower portion of Spring Canyon, one of a handful of perennial streams in the park. Spring Canyon drains slopes on either side of Bee Rock, located on the northeast shoulder of Mt. Hollywood, and then is directed to flow through a culvert as it passes underneath Griffith Park Dr. and then east into the Los Angeles River. For this reason, it should be considered a short, but potentially significant tributary of the Los Angeles River, and one of the farthest-downstream drainages to feed into the river before the start of the coastal plain of the L.A. basin near downtown Los Angeles.

Spring Canyon, like most of Griffith Park's drainages, has been highly impacted in this downstream section, which is roughly encircled by the "Old Zoo Trail", a dirt fire road that serves as a popular walking path, linking Fern Canyon to the south with Mineral Wells to the north. Upstream of this trail, Spring Canyon splits into a main/south fork, passing along the south face of Bee Rock, and a drier north fork, which climbs northwest and runs along the north side of Bee Rock. While the main fork of Spring Canyon is rather undisturbed, accessed via a narrow, steep footpath, the north fork has been extensively modified by the construction of a series of check dams and small debris basins, with most of the native shrub and tree vegetation intermittently cleared, presumably for flood control. In addition, Bee Rock Trail runs alongside the north fork, allowing for more human use.

By the time Spring Canyon reaches the Old Zoo site, it has been transformed into a more artificial drainage, with masonry and river rock tracing the main creek channel, surrounded alternately by lawn (at upper end of Old Zoo) or more natural oak woodland vegetation (lower end of Old Zoo). Mature oak woodland associated with this drainage dominates the slope north of the Old Zoo site (and continues upstream along the main/south fork of Spring Canyon, and more arid oak woodland mixed with chaparral is found south of Old Zoo. To the north, a mix of chaparral and coastal sage scrub on the hillsides has been extensively planted with (non-native) eucalyptus, presumably dating back to the early 1900s when slopes in most of the park were planted with eucalyptus and pines and irrigated, reportedly in an attempt at discouraging fire.¹ A diverse array of non-native plantings have persisted in the vicinity of the former animal enclosures at Old Zoo, as well as within the main lawn here, and more continue to be planted (including native coast live oaks *Quercus agrifolia*, but also non-native trees such as deodar *Cedrus deodorus*).

Human usage of the Old Zoo area is imperfectly known. Using wildlife cameras, we estimated 500+ trips per day by hikers, dog-walkers and joggers along each of the more well-used paths at nearby Fern Dell during summer/fall 2013; usage is obviously lower at Old Zoo, but hikers are frequently seen using the Old Zoo Trail, and walking around the main lawn area to access the trail system.

Ecologically, most of Griffith Park, including Old Zoo, is essentially a lower-foothill site in coastal southern California, with elevations ranging from near 100 meters above mean sea level (MSL) along the Los Angeles River (northern and eastern boundary) up to just over 500 meters MSL atop several peaks along a central ridge. The park features numerous steep seasonal drainages flowing down from ridges, a few of which have running water year-round (Figure 1). Daytime temperatures are hot and dry from late spring through fall, with cooler periods in late winter; average low/high temperatures in May are 58°/75° F, and 48°/69° F in December (late summer temperatures, at least on ridges, frequently approach and occasionally exceed 100° F)². Most precipitation (from Pacific storms) falls in January and February, and averages around 15 inches per year (though many years are much drier). Graded fire roads and informal footpaths form trails, and provide access the majority of the entire park.

Habitat and Vegetation

The natural communities of Griffith Park have only recently been formally described and mapped (Melendrez 2004, Keely and Sawyer-Wolf 2006, AIS 2007, Cooper and Mathewson 2009), the majority of which are dominated by chaparral and scrub. The vegetation at Old Zoo is notable for several reasons: it is one of the most extensive and intact oak woodlands in the park, oak woodlands having been widely converted to picnic areas, golf courses, and other uses in the past. The woodland is augmented with several riparian elements, such as

¹ It has long been assumed that natural scrub and chaparral is a fire risk, and that grass and trees isn't, which has resulted in the removal of scrub and its replacement by irrigated vegetation; of course, when this irrigation stops for various reasons (e.g. broken pipes, water cost), the dried grass and weeds and drying trees make fire (and, in particular, ignition) risk incalculably worse.

² www.weather.com; data from Glendale, CA

willows (*Salix* spp.), mulefat (*Baccharis salicifolius*) and western sycamore (*Platanus racemosa*), indicating that groundwater is very close to the surface. Perennial flow of water begins just upstream of Old Zoo where Old Zoo Trail crosses the main stem (or south fork) of Spring Canyon; here, a lush growth of several species of ferns occupies wet rock faces, and just upstream lie some of the only known locations in the park for multiple species, including scarlet monkeyflower (*Erythranthe cardinalis*), wrinkled rush (*Juncus rugulosus*) and Fremont cottonwood (*Populus fremontii*).



Figure 2. Picnic area just downstream of Old Zoo site, showing native sycamores along what was formerly lower Spring Canyon, and wildland areas of the park just beyond (D. Cooper, Dec. 2007).

Old Zoo is also directly adjacent to extensive, rugged wildland habitats in the center of Griffith Park (Figure 2) which in a recent analysis of rare plant distribution (Cooper 2011) was found to be among the richest survey blocks for rare plants parkwide. Many of these state- and locally-rare species are found within a few meters from the developed areas of Old Zoo, including valley cholla (*Cylindropuntia californica* var. *parkeri*) on the arid slope just north of Old Zoo and Humboldt lily (*Lilium humboldtii* var. *ocellatum*) along the canyon bottom. Most significant, the only Santa Monica Mountains occurrence of the rare endemic San Gabriel Mountains leather oak (*Quercus durata* var. *gabrielensis*) is known only from Spring Canyon (Figure 3); one collection was made at the base of Bee Rock in 1991, and another likely candidate was collected during this study at the southern edge of the Old Zoo site (Figure 4). Both Humboldt lily and the leather oak are considered “rare” by the California Native Plant Society, ranked 4.2 (“limited distribution”; see www.cnps.org).



Figure 3. Left: Ocellated Humboldt lily, photographed in Brush Canyon in June 2014 (M. Whitmire). Above: Probable San Gabriel Mountains leather-oak adjacent to Old Zoo, showing tomentum on the underside the leaf, and distinctive “rolled down” leaf edges; the only known location in Griffith Park.



Figure 4. Path leading to Old Zoo site from lower picnic area, showing oak woodland (at left) where likely San Gabriel Mountains leather-oak was recently discovered (D. Cooper, June 2014).

METHODS

Through the Griffith Park Natural History Survey effort, we have developed several sources of data for wildlife in Spring Canyon, including post-fire bird surveys conducted in 2007-2008 (D.S. Cooper, unpubl. data); bird data submitted to eBird (www.eBird.org); bat surveys conducted by Stephanie Remington at the Old Zoo in 2008 (30 May, 2 June, 3 Aug., 2 Sept., 1 Oct., and 3 Nov.; part of “Central Region” in Remington and Cooper 2009); mammal photographs from remote cameras; plus incidental observations of herptiles and butterflies by D.S. Cooper and T.C. Bonebrake since 2007.

Table 1. Summary of bird surveys by D.S. Cooper at Old Zoo, 2007-2014.

Date	Time
May 30, 2014	10:30 – 11:00 AM*
May 30, 2014	9:30 – 10:30
May 15, 2014	9:50 – 10:50 AM
Nov. 30, 2008	8:00 – 9:00 AM
May 22, 2008	8:00 – 9:00 AM
Apr. 15, 2008	8:00 – 9:00 AM
Feb. 8, 2008	10:00 – 11:00 AM
Jan. 7, 2008	8:00 – 9:00 AM
Oct. 16, 2007	8:00 – 9:00 AM
Apr. 10, 2007	8:00 – 9:00 AM

* Spring Canyon upstream of Old Zoo

RESULTS

The following is a summary of the known flora and fauna of the Old Zoo site.

Birds

Of the more than 100 species of birds known from the Old Zoo site and adjacent picnic area and trails (www.eBird.org), more than 30 are suspected of nesting regularly, as evidenced by pairs or singing individuals in known breeding habitat during April and May. Three species of raptors are suspected of breeding at Old Zoo, the Cooper's Hawk (*Accipiter cooperii*), Red-tailed Hawk (*Buteo jamaicensis*) and Great Horned Owl (*Bubo virginianus*).

Cooper's Hawk (*Accipiter cooperii*) One engaged in courtship display 10 April 2007. Nested in 2010 (2 young), with three birds present the next year on 11 April 2011 (J. Ray, eBird).

Red-tailed Hawk (*Buteo jamaicensis*) Pair in May 2014; Up to 5 birds year-round, no nesting notes from eBird.

Mourning Dove (*Zenaida macroura*) Small numbers in spring; likely breeds in area.

Great Horned Owl (*Bubo virginianus*) Two detected on Jan 16, 2011 (J. Ray, eBird).

Common Poorwill (*Phalaenoptilus nuttalli*) Likely resident on slopes above Old Zoo; one heard calling from Bee Rock on 3 Nov. 2008 (S. Remington, via email).

White-tailed Swift (*Aeronautes saxatalis*) Likely breeds at Bee Rock, above Old Zoo.

Black-chinned Hummingbird (*Archilochus alexandri*) Up to four in May 2014; likely nests in sycamores.

Anna's Hummingbird (*Calypte anna*) Up to four in April 2007 and 2008; possibly overlooked in May 2014.

Allen's Hummingbird (*Selasphorus sasin*) Present and common during first half of year (Jan. – June).

Acorn Woodpecker (*Melanerpes formicivorus*) Up to 12 individuals in May 2014; obviously a significant colony is resident in oaks and other trees in and around Old Zoo.

Nuttall's Woodpecker (*Picoides nuttallii*) Up to four birds (= 2 pr) present May 2014 (nesting observed by G. Hans June 2014).

Downy Woodpecker (*Picoides pubescens*) Irregularly recorded, but pairs have been seen in spring (e.g., Mar. 2008, DSC) and it may nest.

Pacific-slope Flycatcher (*Empidonax difficilis*) A single pair in 2007 and 2014, toward the upper end of the site where the canyon becomes more natural. This would make an ideal indicator species given its preference for native habitat.

Black Phoebe (*Sayornis nigricans*) Single pairs in 2007 and 2014, in picnic area/lawn habitat.

Ash-throated Flycatcher (*Myiarchus cinerascens*) 1-2 birds in 2008 and 2014, so possibly not breeding; would make an ideal indicator species given its preference for native habitat.

Hutton's Vireo (*Vireo huttonii*) Single bird singing May 2014 in upper/natural portion of site; would make an ideal indicator species given its preference for native habitat.

Western Scrub-Jay (*Apelocoma californica*) Small numbers through spring; likely breeds.

American Crow (*Corvus brachyrhynchos*) Small numbers year-round.

Common Raven (*Corvus corax*) Apparent pairs; may nest in tallest trees or in crevices at Bee Rock.

Oak Titmouse (*Baeolophus inornatus*) Up to four during surveys, so possibly two pairs present; would make an ideal indicator species given its preference for native habitat.

Bushtit (*Psaltiriparia minima*) Resident; possible family group in May 2014.

House Wren (*Troglodytes aedon*) Five detected in May 2014 (oddly, not in spring 2007-08); likely breeds in sycamore cavities (nesting observed by G. Hans June 2014).

Bewick's Wren (*Thryomanes bewickii*) Three in May 2014; year-round resident.

Blue-gray Gnatcatcher (*Poliophtila caerulea*) One in May 2014 was in oak woodland upstream of Old Zoo site, where it may breed; would make an ideal indicator species given its preference for native habitat (mature chaparral).

Wrentit (*Chamaea fasciata*) Up to four in recent springs (= 2 pairs); would make an ideal indicator species given its preference for native habitat.

Western Bluebird (*Sialia mexicana*) Single pairs noted in April/May 2007 and 2014, nests almost exclusively in sycamores in park.

American Robin (*Turdus migratorius*) Common through spring, particularly on lawns.

California Thrasher (*Toxostoma redivivum*) Just 1-2 birds in April 2008/2014; would make an ideal indicator species given its preference for native habitat.

Northern Mockingbird (*Mimus polyglottos*) Common year-round.

European Starling (*Sturnus vulgaris*) Breeds in sycamores (6 in May 2014).

Phainopepla (*Phainopepla nitens*) Regular in May-June when breeding would be expected.

Orange-crowned Warbler (*Oreothlypis celata*) Common through spring; nesting pair observed in 2007 at upper edge of picnic area (DSC).

Spotted Towhee (*Pipilo maculatus*) Common year-round.

California Towhee (*Melospiza crissalis*) Common year-round

Song Sparrow (*Melospiza melodia*) Fairly common (in low numbers) year-round; one or two pairs may nest in denser vegetation along stream.

Dark-eyed Junco (*Junco hyemalis*) Now common year-round, and nesting widely in park.

Black-headed Grosbeak (*Pheucticus melanocephalus*) Common through spring and summer.

Brewer's Blackbird (*Euphagus cyanocephalus*) Likely nests in picnic area/playground; not in native habitat.

Brown-headed Cowbird (*Molothrus ater*) Brood parasite present irregularly but likely breeds every year.

Hooded Oriole (*Icterus cucullatus*) Common through spring; nests in palms and sycamores.

Bullock's Oriole (*Icterus bullockii*) Common nester in sycamores in area, but records sparse, particularly in early spring when it should be on territory.

House Finch (*Haemorhous mexicanus*) Common year-round.

Lesser Goldfinch (*Spinus psaltria*) Common year-round.

House Sparrow (*Passer domesticus*) Common year-round, but like Brewer's Blackbird, only in picnic area/non-native habitats.

In winter, many additional species of birds arrive, and during spring and fall migration, many additional species may be observed as they migrate through the area.

Mammals

The Old Zoo site is notable for mammals for several reasons. For large/mid-sized mammals, including carnivores, it is one of the few areas where gray fox (*Urocyon cinereoargenteus*) has been detected in the park (other areas where recorded include the north slope of Mt. Lee and the current L.A. Zoo property) (Mathewson et al. 2008). It also appears to be a high-use area for bobcat (*Lynx rufus*), according to a graduate student conducting research here in the mid-2000s³. Studies of the isolated western gray squirrel (*Sciurus griseus*) population in Griffith Park revealed that Old Zoo/Spring Canyon lies between two known subpopulations of this species in the park (Cooper 2013), and thus could represent an important restoration area if animals were to be (re-)introduced here (currently, the eastern fox squirrel *Sciurus niger*, is very common here, pers. obs.). A survey of bat usage of the park in 2008 revealed that the “central area”, which included Bee Rock, Spring Canyon and Old Zoo, had the highest bat diversity and overall detections of any area of the park (Remington and Cooper, in press), with big brown bat (*Eptesicus fuscus*), western red bat (*Lasiurus blossevillii*), hoary bat (*Lasiurus cinereus*), California myotis (*Myotis californicus*), canyon bat (*Parastrellus hesperus*), and Mexican free-tailed bat (*Tadarida brasiliensis*) all confirmed present. Several species were assumed to be roosting, if not breeding, in the trees and rock outcrops in and around Old Zoo.

Most remarkably, a credible, though second-hand report of a black bear (*Ursus americanus*) from 24 April 2012 was received via email (F. Martinez, 25 Apr. 2012), seen at close range during a night hike (with a “pen light”) by five hikers near the confluence of Spring Canyon and the Old Zoo trail. A non-native species in the region⁴, black bear has also been reported from the Stone Canyon area, and several animals have been killed or captured/relocated while trying to cross south into the Santa Monica Mountains from the Simi Hills near Westlake Village/Agoura Hills. Obviously, if a mountain lion (*Felis concolor*) can reach the park (“P22”, resident since at least early 2012), a black bear certainly could.

Reptiles/Amphibians

Most of the herptiles known from Griffith Park have been observed in Spring Canyon, including some adjacent to the Old Zoo site. The ubiquitous western fence-lizard *Sceloporus occidentalis* is the most common, and Pacific tree frog *Pseudocris regilla* is almost certainly present in upper Spring Canyon or wherever water pools.

Southern Pacific rattlesnake (*Crotalus oreganus helleri*), Pacific gopher snake (*Pituophis cantifer cantifer*), striped racer (*Coluber lateralis lateralis*) and San Bernardino ringneck snake (*Diadophis punctatus modestus*) have all been noted along the Old Zoo Trail and/or in adjacent Spring

³ Main areas in park with bobcat scat: Mt. Lee, Oak Cyn., Royce Cyn., Fern Cyn., and “above the Old Zoo” (= Spring Cyn.) N. Osborn, via email, 2 Jan., 2009).

⁴ California grizzly, *Ursus arctos californicus*, was our local native bear, now considered an extinct subspecies of the more widespread grizzly bear complex.

Canyon, as have southern alligator lizard (*Elgaria multicarinata webbi*). Most remarkable was a juvenile arboreal salamander collected in December 2008 (deposited at Los Angeles Co. Museum of Natural History) found (by DSC) under a slab of oak bark along Spring Canyon just a few meters upstream of the Old Zoo lawn. Slender-salamanders *Batrachoseps* sp. have been observed under oak bark in the same area, in late winter after rain (Figure 5).



Figure 5. Slender-salamander, likely *Batrachoseps nigriventris*, photographed adjacent to Old Zoo 7 Dec. 2007, D.S. Cooper).

Western skink (*Plestidon skiltonianus skiltonianus*) and western toad (*Anaxyrus boreas halophilus*) have not been observed here, but they may be present, the latter likely using pooled water in the upper canyon.

RESTORATION RECOMMENDATIONS

Four areas in the vicinity of the Old Zoo appear to offer ideal opportunities for habitat restoration, as shown in Figure 6 and as summarized and enumerated below. Further analysis is required before implementation of these restorations and should include a review of the built and natural histories of the areas.



Figure 6. Illustration of potential restoration areas at the Old Zoo site.

1. Upper Spring Canyon

Spring Canyon is a semi-perennial stream (flowing year-round during normal rainfall years) that emerges from the steep eastern escarpment of Griffith Park and flows east along the north side of the Old Zoo site. Even in its upstream portion, it is heavily infested with non-native plant species, in particular sticky eucalyptus and smilo grass, with smaller occurrences of castor bean and other weeds (Figure 7). We recommend a dedicated effort to remove these non-natives, to allow native species to thrive again. As the site is well-irrigated naturally by streamflow, we do not recommend planting here.



Figure 7. Upper Spring Canyon showing sticky eupatory and smilo grass (D. Cooper, Aug. 2010).

2. “North Fork” of Spring Canyon

Upstream of the Old Zoo site, past flood-control efforts have result in a series of check-dams having been constructed along two small stretches of streambed, one in “main” Spring Canyon, and the other in the drainage immediately to the north of here, which I’ve called North Fork Spring Canyon (Figure 8). Here, native shrubs and trees were removed years ago (and regular removal may yet be ongoing), and the streambed excavated to form small debris basins, presumably with heavy machinery. These basins have since filled with silt, and now offer little flood control, and support little native riparian vegetation. Here we recommend removal of these check-dams and revegetation of the streambed, which is very short and clearly never experiences flows sufficient to warrant such extreme flood-control measures.



Figure 8. “North Fork” Spring Canyon showing unused check dams.

3. Lower Spring Canyon

The stretch of creek adjacent to the main Old Zoo lawn and upstream of the lower picnic area is one of the most impacted areas of the site, even though aesthetically it may resemble a normal oak-lined stream. Here, the streambed was replaced with cement and rock many years ago, reducing the permeability of what should be at least seasonally-moist soil, and seriously affecting natural riparian vegetation (Figure 9). Today, sparse willow and mulefat growth suggest that this section of the drainage could be transformed into a vibrant riparian ecosystem with at least partially removal of some of the cement, particularly along the actual streambed (the sides of the stream have no cement and appear more or less in a natural state).



Figure 9. Cement and rock streambed adjacent to Old Zoo.

4. Eucalyptus grove

Just north of the access road that approaches the Old Zoo site from the east is a slope of native coastal sage scrub and chaparral (Figure 10). This slope can support a spectacular wildflower display after wet winters, in particular a large population of the bright purplish-blue Canterbury-bells (*Phacelia minor*), and one of the few populations of the rare native cholla cactus *Cylindropuntia californica* var. *parkeri*. Decades ago, eucalyptus trees were introduced to the slope, as they were throughout the eastern half of the park (see Cooper and Mathewson 2009). We recommend immediate selective removal of the dead and dying trees, with gradual removal (over several years) of all the eucalyptus on this slope. As they are north of the parking area, they provide no shade for parked cars (unlike the native sycamores and California bay trees of the picnic area, which do), and their leaves and resins continue to slowly degrade the native scrub ecosystem here.



Figure 10. Typical “wildland planting” of eucalyptus on ridge near Old Zoo. Infestation of non-native grass in foreground is likely ripgut brome (*Bromus diandrus*), a remnant of understory clearing (for planting), combined with irrigation of eucalyptus trees.

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ATTACHMENT 2

Griffith Park 5.2.14
Performing Arts Center

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May 2, 2014

Via Federal Express

Ms. Holly L. Wolcott, Interim City Clerk

200 N. Spring Street, Room 360

Los Angeles, CA 90012

Board of Commissioners

Los Angeles City Recreation and Parks Department

221 N. Figueroa St. Suite 1510

Los Angeles, CA 90012

Re: Appeal of adoption of initial study/mitigated negative declaration and conceptual approval for the Performing Arts Center Project; W.O. #E170202A; Public Resources Code § 21151 (c)

Dear Clerk:

On behalf of Friends of Griffith Park, the Griffith J. Griffith Charitable Trust, and Sierra Club Angeles Chapter Griffith Park Task Force ("Appellants"), we hereby appeal the April 2, 2014 decision of the Board of Commissioners of the Los Angeles City Recreation and Parks Department to adopt an initial study and mitigated negative declaration for the Griffith Park Performing Arts Center Project ("Project"). Section 21151 of the Public Resources Code provides, "If a nonelected decisionmaking body of a local lead agency certifies an environmental impact report... that certification ... may be appealed to the agency's elected decisionmaking body, if any." As the Board of Commissioners is not an elected decisionmaking body, its determinations under the California Environmental Quality Act (CEQA) are appealable to the City's elected decisionmaking body, the City Council. Appellants live near and recreate in Griffith Park and have a vested interest in protecting the Park's historic, biological, and recreational values. Appellants respectfully urge the City Council to deny approval of the Project until an environmental impact report (EIR) has been prepared that adequately discloses and mitigates the Performing Arts Center Project's significant adverse impacts.

The Project authorizes the construction of a permanent stage to serve audiences of up to 5,000 people in the Old Zoo Picnic Area portion of Griffith Park. The Project also includes ancillary development, such as a new switchboard, resurfaced parking lot, improved restrooms, power line relocation, pathways, and an Americans with Disabilities

Ms. Holly L. Wolcott, Interim City Clerk
May 2, 2014
Page 2 of 3

Act-compliant bridge, although portions of the Project have not yet undergone environmental review or are mischaracterized in the initial study and mitigated negative declaration (MND). (See, Exhibit D.)

Dating to 1913 and later a center of Works Progress Administration projects, the Old Zoo Picnic Area is integral to Griffith Park's 2009 designation as Los Angeles Historic-Cultural Monument #942. The entire Old Zoo Picnic Area has been delineated as both a sensitive historic resource and a wilderness zone. Due to the site's proximity to higher-elevation areas and a seasonal stream, the Old Zoo Picnic Area is the only part of the Park known to host the gray fox and has the highest density and species of bats (including three special-status species). The construction of a permanent stage with poles for lighting and sound, pathway, and bridge would dramatically alter the visual character of the Old Zoo by overshadowing the aesthetic features for which it is known, a significant impact on historic resources. Additional nighttime activities and human presence will discourage use of the area by wildlife, thereby blocking known movement corridors. The Project would also introduce new sources of light and noise into the Old Zoo and adjacent significant ecological areas that adversely impact the behavior and foraging of nocturnal species, such as bats, mountain lions, and bobcats. Although the site is currently unlit, the MND contains no analysis or mitigation of the Project's lighting impacts. Alone and cumulatively, the Project's impacts due to the introduction of amplified sound could have significant adverse impacts on wildlife that have not been adequately considered or mitigated. There is a fair argument that the Project may have significant adverse impacts on historic and biological resources, and an environmental impact report is required.

In addition to its likely significant, unmitigated impacts on the Park's historic and biological value, the Project may have a detrimental impact on recreational resources that has not been adequately considered. An increase in the attendance or frequency of performances would reduce the Old Zoo Area's tranquility, especially for picnickers and passing hikers. The Project's use for events requiring an admission fee would restrict the site's availability for free recreation while also violating the restrictions of the Project's Proposition K funding.

Further, the MND has improperly piecemealed the Project's environmental review, as the bridge and accessibility improvements, and their likely environmental impacts, have been omitted from the analysis.

Considering its likely environmental cost, Appellants believe the Project is unnecessary. While Appellants support the spirit of free arts performances, permanent stages are already available for outdoor performances in Griffith Park. A new performance space is set to open at the Los Angeles Zoo in 2015.

Ms. Holly L. Wolcott, Interim City Clerk
May 2, 2014
Page 3 of 3

Friends of Griffith Park, the Griffith J. Griffith Charitable Trust, and the Sierra Club Griffith Park Task Force look forward to scheduling the hearing on this appeal. Appellants hereby incorporate into this appeal the letters submitted to the City and its departments on May 22, 2013, January 22, 2014, and March 16, 2014. These letters contain additional information and detail regarding the basis of this appeal. (See, Exhibits C-E.)

Thank you for your consideration of this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Michelle N. Black", written over a horizontal line.

Michelle N. Black

Exhibits:

- A. Report of General Manager No. 14-062, March 5, 2014
- B. Minutes of Board of Recreation and Park Commissioners Meeting, April 2, 2014
- C. Letter from Friends of Griffith Park to M. Martin, May 22, 2013
- D. Letter from Friends of Griffith Park to P. Davis, January 22, 2014
- E. Letter from Sierra Club – Angeles Chapter, Griffith Park Task Force, March 16, 2014

REPORT OF GENERAL MANAGER

APPROVED
APR 02 2014

NO. 14-062

DATE March 5, 2014

BOARD OF RECREATION
& PARK COMMISSIONERS

C.D. 4 and 13

BOARD OF RECREATION AND PARK COMMISSIONERS

SUBJECT: GRIFFITH PARK - PERFORMING ARTS CENTER (W.O. #E170202A)
PROJECT - ADOPTION OF THE INITIAL STUDY / MITIGATED
NEGATIVE DECLARATION AND CONCEPTUAL APPROVAL OF THE
PROJECT

R. Adams	_____	V. Israel	_____
*R. Barajas	<u>anfa</u>	K. Regan	_____
H. Fujita	_____	N. Williams	_____

Neh Israel
General Manager

Approved _____ Disapproved _____ Withdrawn _____

RECOMMENDATIONS:

That the Board:

1. Review, consider, and adopt the Initial Study/Mitigated Negative Declaration (IS/MND), on file in the Board office and on the Department of Recreation and Parks (RAP) website, www.laparks.org, for the proposed Griffith Park - Performing Arts Center (W.O. #E170202A) project, finding that all potentially significant environmental effects of the project have been properly disclosed, evaluated and mitigated in compliance with the California Environmental Quality Act (CEQA) and the State and City CEQA Guidelines, and that the IS/MND reflects the RAP's independent judgment and analysis;
2. Review, consider, and adopt the Mitigation Monitoring Program in Chapter 5 of the IS/MND that specifies the mitigation measures to be implemented in accordance with the CEQA Guidelines (Section 15407(d));
3. Grant conceptual approval of the proposed project, as described in the IS/MND; and,
4. Direct staff to file a Notice of Determination with the Los Angeles City Clerk and the Los Angeles County Clerk within five (5) working days of the Board adopting the IS/MND.

REPORT OF GENERAL MANAGER

PG. 2

NO. 14-062

SUMMARY:

Griffith Park is one of the largest municipal parks in the nation, approximately 4,200 acres in size. The Park was established in 1896 by the donation of private land owned by Colonel Griffith J. Griffith to the City of Los Angeles and is under the jurisdiction of RAP. In 2009, the City designated Griffith Park as Historic-Cultural Monument (HCM) No. 942. The project site is located adjacent to the old Los Angeles Zoo area. The proposed Griffith Park - Performing Arts Center (W.O #E170202A) project would include the construction of the outdoor performing arts stage and associated improvements to be constructed in two (2) phases. The first phase will include construction of a 45 foot by 45 foot stage with two (2) artistic overhead structures, undergrounding of existing utility lines, and renovation of existing restrooms for Americans with Disabilities Act (ADA) compliance, installation of lighting, and ADA picnic and viewing areas. The second phase will include installation of an ADA-compliant prefabricated modular pedestrian bridge, ADA improvements to paths, installation of path lighting, refurbishment of existing stairs, and ADA parking improvements. Electrical connections would be provided, but no permanent sound amplification equipment or speakers would be installed as part of the project. Lighting fixtures would be installed solely to provide safety and security and would be in a rustic or rural style in keeping with the existing visual character of the Old Zoo area and Griffith Park in general.

In accordance with the requirements of the California Environmental Quality Act (CEQA), a IS/MND was prepared for the project. The IS/MND, which was based on an Initial Study, determined that all potentially significant environmental effects would be mitigated to a level of less than significant. The IS/MND was circulated to all interested parties and responsible agencies for a thirty (30) day review and comments period from December 19, 2013 to January 22, 2014. During this public review period, a total of eight (8) emails and/or letters with comment on the IS/MND were received. The comments primarily addressed aesthetics, cultural resources, biological resources, noise and parking effects of the project. All comments have been addressed and incorporated into the final IS/MND for the Board's review and consideration. The comments resulted in only minor changes in the IS/MND, and these changes have been shown in the errata section of the final IS/MND. A Mitigation Monitoring Program has been prepared that specifies all the mitigation measures identified in the IS/MND, which will either reduce or eliminate the potentially significant environment impacts of the project to a level less than significant, in accordance with Section 15097 of the Sate CEQA Guidelines. The mitigations measure included in the IS/MND and Mitigation Monitoring Program will be implemented prior to and during construction, as applicable, to mitigate impacts.

Funding for this project will be from the Proposition K program. Assuming adoption of Final IS/MND by the Board of Recreation and Park Commissioners, Bureau of Engineering (BOE) and RAP staff will proceed with the design of the project and completion of the construction documents. The completed construction documents will then be presented to the Board for approval and call for bids.

REPORT OF GENERAL MANAGER

PG. 3

NO. 14-062

FISCAL IMPACT STATEMENT:

There is no immediate fiscal impact to RAP's General Fund. The assessments of the future operations and maintenance costs have yet to be determined and will be addressed in future budget requests.

This Report was prepared by Sean H. Phan, Project Manager, BOE Recreation and Cultural Facilities Program and reviewed by Paul Davis, Environmental Specialist III, Recreation and Park; Neil Drucker, Program Manager, BOE Recreational and Cultural Facilities Program; Ted Allen, Acting Deputy City Engineer, Bureau of Engineering; and Cathie Santo Domingo, Superintendent, Planning, Construction and Maintenance Branch, Department of Recreation and Parks.

MINUTES

BOARD OF RECREATION AND PARK COMMISSIONERS OF THE CITY OF LOS ANGELES

April 2, 2014

The Board of Recreation and Park Commissioners of the City of Los Angeles convened in regular session at the EXPO Center at 9:41 a.m. Present were President Lynn Alvarez, Vice President Iris Zuñiga and Commissioners Sylvia Patsouras and Misty M. Sanford. Also present were Michael A. Shull, General Manager, and Deputy City Attorney Arletta Maria Brimsey.

The following Department staff was present:

Regina Adams, Executive Officer
Kevin Regan, Assistant General Manager, Operations Branch
Vicki Israel, Assistant General Manager, Partnership and Revenue Branch
Ramon Barajas, Assistant General Manager, Planning, Construction, and Maintenance Branch
Noel Williams, Chief Accounting Employee, Finance Division

APPROVAL OF THE MINUTES

It was moved by Commissioner Patsouras, seconded by Vice President Zuñiga, that the Minutes of the Meeting of March 19, 2014 be approved. There being no objections, the Motion was unanimously approved.

GENERAL MANAGER'S REPORTS

14-078

DEARBORN PARK – IRRIGATION AND FIELD IMPROVEMENTS
(W.O. #E170332F) PROJECT – APPROVAL OF FINAL PLANS AND
CALL FOR BIDS

Cathie Santo Domingo, Superintendent, amended the City Engineer's estimate for the additional construction costs, listed in paragraph 2, on page 2 of the report to \$250,000.00.

14-079

1ST AND BROADWAY CIVIC CENTER PARK – PARK
DEVELOPMENT (PRJ20655) PROJECT – AUTHORIZATION TO
DEMOLISH, APPROVAL OF DEMOLITION PLANS, ALLOCATION
OF QUIMBY FEES, AND EXEMPTION FROM THE CALIFORNIA
ENVIRONMENTAL QUALITY ACT

The report was withdrawn.

14-080

GREEK THEATRE CONCESSION – AMENDMENT TO CONTRACT
NO. 3444 WITH STRATEGIC ADVISORY GROUP LLC
(CONSULTANTS)

April 2, 2014

14-082

SUMMER LUNCH PROGRAM – NATIONAL RECREATION AND
PARK ASSOCIATION 2014 OUT-OF-SCHOOL TIME PROGRAMS
GRANT – AUTHORIZATION TO SUBMIT GRANT APPLICATION;
ACCEPTANCE OF GRANT FUNDS

14-083

VARIOUS DONATIONS OPERATIONS BRANCH – METRO

14-084

VARIOUS COMMUNICATIONS

The above items were each separately described and presented to the Board by Department staff, and the Board further discussed various of the items in detail. Public comment was invited on all items of the agenda. One request for public comment was received and such comment was made to the Commission.

It was moved by Vice President Zuñiga, seconded by Commissioner Patsouras, that the General Manager's Reports be approved as amended, and that the Resolutions recommended in the reports be thereby approved. There being no objections, the Motion was unanimously approved.

14-081

TRAVEL TOWN MUSEUM GIFT SHOP CONCESSION –
AMENDMENT NO. 2 TO CONCESSION CONTRACT NUMBER 262
AND DONATION OF A NEW MODULAR BUILDING

Pursuant to advice received by the City Attorney, President Alvarez recused herself from acting on this item.

After President Alvarez exited the room, the meeting was chaired by Vice President Zuñiga.

Based on comments provided in the Concession Task Force meeting, Noel Williams, Chief Accounting Employee, amended the contract to state that only for the financial information, that in Year Five of the operation of the Agreement, staff would begin evaluating and negotiating with the Non-Profit for financial terms to take effect during Year Seven. Those terms would be either the greater of 5% of revenues, or the stated amount which is in the contract for the next evaluation period.

The above item was presented to the Board by Department staff, and the Board further discussed the item in detail. Public comment was invited on the item. Six requests for public comment were received and such comment was made to the Commission.

It was moved by Commissioner Patsouras, seconded by Commissioner Sanford, that General Manager's Report 14-081 be approved as amended, and that the Resolutions recommended in the report be thereby approved. There being no objections, the Motion was unanimously approved.

April 2, 2014

UNFINISHED BUSINESS

Memorandum: LOS ANGELES POLICE DEPARTMENT – PROPOSED MEMORANDUM
OF AGREEMENT
(Original Date – 4/17/13)

The report was held.

14-009

PARKS INITIATIVE – LAUREL CANYON/MULHOLLAND OPEN SPACE ACQUISITION PROJECT, 8100 WEST MULHOLLAND DRIVE – REQUEST FOR FINAL AUTHORIZATION TO ACQUIRE PROPERTY – ESCROW INSTRUCTIONS AND LEGALLY OBLIGATED ACQUISITION COSTS, PURCHASE AND SALE AGREEMENT, ALLOCATION OF PROPOSITION K FUNDS, AND EXEMPTION FROM THE CALIFORNIA ENVIRONMENTAL QUALITY ACT

(Original Date – 1/22/14)

Commissioner Sanford requested that the report be amended to add a recommendation directing staff to negotiate a maintenance agreement with Mountains Recreation and Conservation Authority.

14-047

PLAYGROUND AND RECREATION RELATED EQUIPMENT, ACCESSORIES, AND SUPPLIES CONTRACT – USE OF THE NATIONAL JOINT POWERS ALLIANCE (NJPA) SELECTION PROCESS FOR PLAYGROUND AND RECREATION RELATED EQUIPMENT, ACCESSORIES, AND SUPPLIES WITH PLAYPOWER, INC.

(Original Date – 3/5/14)

14-048

PLAYGROUND EQUIPMENT, SURFACING, SITE FURNISHINGS, AND RELATED PRODUCTS AND SERVICES CONTRACT – USE OF THE STATE OF NORTH CAROLINA, COUNTY OF MECKLENBURG SELECTION PROCESS TO PROVIDE PLAYGROUND EQUIPMENT, SURFACING, SITE FURNISHINGS AND RELATED PRODUCTS AND SERVICES (CONTRACT NO. 110179) WITH PLAYCORE WISCONSIN, INC. DBA GAMETIME

(Original Date – 3/5/14)

14-049

RECREATION AND PARKS EQUIPMENT CONTRACT – USE OF HOUSTON-GALVESTON AREA COUNCIL SELECTION PROCESS FOR RECREATION AND PARKS EQUIPMENT, SERVICE AND INSTALLATION WITH LANDSCAPE STRUCTURES, INC.

(Original Date – 3/5/14)

April 2, 2014

14-050

ALTERNATIVE ENERGY EQUIPMENT CONTRACT – USE OF HOUSTON-GALVESTON AREA COUNCIL SELECTION PROCESS FOR THE PURCHASE OF ALTERNATIVE ENERGY EQUIPMENT AND INSTALLATION SERVICES WITH SOLARWORLD AMERICAS LLC

(Original Date – 3/5/14)

The above items were each separately described and presented to the Board by Department staff, and the Board further discussed various of the items in detail. Public comment was invited on all items. Two requests for public comment were received and such comments were made to the Commission.

It was moved by Commissioner Sanford, seconded by Vice President Zuñiga, that the General Manager's Reports be approved as amended, and with exceptions as noted, and that the Resolutions recommended in the reports be thereby approved. There being no objections, the Motion was unanimously approved.

14-062 - Taken Out of Order

GRIFFITH PARK – PERFORMING ARTS CENTER (W.O. #E170202A) PROJECT – ADOPTION OF THE INITIAL STUDY/MITIGATED NEGATIVE DECLARATION AND CONCEPTUAL APPROVAL OF THE PROJECT

(Original Date – 3/5/14)

The above item was presented to the Board by Department staff, and the Board further discussed the item in detail. Public comment was invited on the item. Thirty-nine requests for public comment were received and such comments were made to the Commission.

It was moved by Commissioner Sanford, seconded by Vice President Zuñiga, that General Manager's Report 14-062 be approved, and that the Resolutions recommended in the report be thereby approved. There being no objections, the Motion was unanimously approved.

14-061

GRIFFITH PARK CRYSTAL SPRINGS – NEW BASEBALL FIELDS (W.O. #E170110B) PROJECT – CERTIFICATION OF THE FINAL ENVIRONMENTAL IMPACT REPORT AND APPROVAL OF THE PROJECT

(Original Date – 3/5/14)

Cathie Santo Domingo amended the report to replace the second paragraph on page 4 of the report with the following language:

"The offices of Council District 4 and Council District 13 support active recreation and baseball (adult and youth) fields in the Crystal Springs area of Griffith Park. Neither office supports the North Atwater Park alternative."

April 2, 2014

The above item was presented to the Board by Department staff, and the Board further discussed the item in detail. Public comment was invited on the item. Thirty-seven requests for public comment were received and such comments were made to the Commission.

In response to comments made by Commissioner Sanford, Cathie Santo Domingo recommended the report be further amended to add a recommendation to direct staff to provide a report back addressing the mitigation of the trees and addressing the specific usage of the facility.

It was moved by Vice President Zuñiga, seconded by Commissioner Patsouras, that General Manager's Report 14-061 be approved as amended, and that the Resolutions recommended in the report be thereby approved. There being no objections, the Motion was unanimously approved.

COMMISSION TASK FORCES

Commission Task Force on Facility Repair and Maintenance (Commissioners Blumenfield and Sanford)

Commissioner Patsouras reported that there was a contract on golf and tennis reservation systems that would be coming before the full Board in May. There was also a report on the Lummi Home regarding Request for Proposals (RFP). Staff has extended the due date on the RFP and will conduct additional outreach to broaden the search for potential proposers. Lastly, the Travel Town agreement which was approved earlier in the meeting was amended based on comments provided in the Concessions Task Force meeting.

Commission Task Force on Concessions (Commissioners Patsouras and Zuñiga)

Commissioner Sanford reported that staff will work to reschedule the Facility Task Force meetings to take place after the Board of Recreation and Park meetings to allow time for more in depth discussions. She further reported that staff discussed the request for the reconsideration of the placement of a monument in Solano Canyon and the review of a request made by Councilmember Bernard Parks to rename Saint Andrews Recreation Center. Lastly, she reported that a discussion took place relative to the Daughters of American Revolution's offer to install a plaque in Pan Pacific Park.

GENERAL MANAGER'S ORAL REPORT

Michael Shull, General Manager, reported on Department activities.

FUTURE AGENDA ITEMS

There was no request for future items.

PUBLIC COMMENTS

Public comment was invited. One request for public comment was received and such comment was made to the Commission.

April 2, 2014

NEXT MEETING

The next scheduled meeting of the Board of Recreation and Park Commissioners was scheduled to be held on Monday, April 14, 2014 at 9:30 a.m., at Northridge Recreation Center, 18300 Lemarsh Street, Northridge, CA 91324.

ADJOURNMENT

There being no further business to come before the Board, the meeting adjourned at 1:35 p.m.

ATTEST



PRESIDENT



BOARD SECRETARY



Friends of Griffith Park

P.O. Box 27573

Los Angeles, CA 90027-0573

friendsofgriffithpark.org

May 22, 2013

Ms. Maria Martin
City of Los Angeles Bureau of Engineering
Environmental Management Group
1149 S. Broadway, 6th Floor, Mail Stop 939
Los Angeles, CA 90015-2213

RE: Prop K Performing Arts Center for Youth

Dear Ms. Martin,

In a letter dated October 4, 2012, Friends of Griffith Park enumerated our concerns about the LVNOC process that led to our decision to decline participation as a panelist in the Prop K Performing Arts Center LVNOC. The letter also confirmed our stakeholder interest in the project and our intent to provide comments when more details were known.

We are now submitting our comments.

The process outreach to project area users has been inadequate. At the April 17, 2013 Resource Board Meeting, it was announced that the department would be meeting with the project's "two user groups," by which was meant the Independent Shakespeare Company and Symphony in the Glen. The project site's primary users are picnickers, passive recreationists, hikers and wildlife enthusiasts. These established groups have received no such courtesy, although the project proposes a fundamental change in use that will negatively impact them.

Plans for the project are vague. The rough sketches provided do not indicate the proposed structure's dimensions nor the new infrastructure and changes to existing infrastructure that will be required to support its functions. Moreover, spoken descriptions of the project continue to evolve indicating that this is a larger and much costlier project than originally stipulated. Prior to the LVNOC process, the project was described not as a stage, but as a foundation for a stage--a "concrete platform, nothing more." Clearly, this is far from the case. Moreover, component project elements have not been considered with respect to their impacts on Griffith Park. These include

provisions for parking, bridges, roads, drainage and trails. For example, when questioned about parking impacts at the second LVNOC meeting, the staff answered "parking is not in our playbook." At the same meeting, staff said it needed "to look at parking codes to see if they comply." The increased size, complexity and "moving target" nature of this project mandates a CEQA Environmental Impact Report. Only under this formal process can the project's impacts be truly evaluated.

Friends of Griffith Park supports the spirit of arts performances, such as performances which Symphony in the Glen and Independent Shakespeare Company have provided in the past, especially if they are truly free. We are concerned about the "build it and they will come" theory if a permanent stage were to be built. The type and scope of the project's potential uses have not been clearly presented. As a Prop K project, the Performing Arts Center cannot justify limiting its clients to the two dominant performance groups that are participating in the process. The facility cannot be limited to the classic arts but will be available for all types of entertainment—including for-profit corporate entertainment. There are currently no stipulations against charging admission or operating year round. The impacts of the project are far greater than have been represented.

Griffith Park is already rich in permanent stages. These include the Greek Theatre outdoor amphitheater, Griffith Observatory Event Horizon Theater, The Autry National Center Wells Fargo Theatre and Outdoor Lawn, the Los Angeles Zoo Adventure Theater, and the Los Angeles Zoo Witherbee Auditorium. Additionally, the Los Angeles Zoo has revealed its intention to create a 1000-capacity event and performance venue opening in 2015. Both the Autry and Los Angeles Zoo stages are within a short radius of the project site. The creation of a duplicative facility at the Old Zoo Picnic Area deserves extra scrutiny because of the cumulative environmental and traffic impacts it represents.

Although this is a 1996 Prop K ballot measure "specified project," the project is not mandated to be built. Conditions in the Park have changed in the 17 years since the measure passed. New factors are present which make its placement obsolete and even override the need for the project in Griffith Park. The aforementioned duplication of performance venues is one example. Another is the public's deeper understanding of and support for the role of Griffith Park in the preservation of native wildlife and ecosystems within the city. In recognition of this, the 2009 designation of Griffith Park as a City of Los Angeles Historic-Cultural Monument (#942) includes a delineation of the Park's Wilderness Zone. The Old Zoo Picnic Area is located entirely within this Wilderness Zone which is defined as a sensitive historic resource. As a consequence, CEQA-mandated environmental considerations should ultimately dictate development and/or mitigation thereof. (It should also be noted that the 1996 ballot measure does not specify that the project be built in the Old Zoo Picnic Area, only that it be built in Griffith Park).

This letter is not meant to be a thorough analysis of the negative impacts a Performing Arts Center may cause. Certainly the historic resource impacts are a key issue, as the

Old Zoo dates to 1913. As a cultural landmark, the Old Zoo has a strong personage connection with Superintendent Frank Shearer, who had forward-thinking concepts when proposing the Los Angeles Zoo, which he expressed in 1910. It is also a valuable historic resource because WPA projects were centered there in the 1930s, in the way of skillfully designed and constructed "grottos" for Zoo animals and other hardscape features. Contrary to the opinion of one of the staff members speaking of the "design" being "low-impact" from a historic-cultural perspective (at LVNOC meeting # 2), the true impact would be felt because of the "change of use" of this irreplaceable cultural landscape which should be preserved.

Biological resources are also important, along with negative impacts to passive recreation, including picnicking, hiking and nature enjoyment.

The Old Zoo Picnic Area is located in a wilderness transition zone and wildlife corridor in the low foothills of Griffith Park. Its environmental significance is scientifically distinguished, as it is designated as a Significant Ecological Area in the County of Los Angeles General Plan. Technical Supplement E, "Significant Ecological Areas/Habitat Management Areas in Los Angeles County" (E-21) the Plan states in part:

Griffith Park lies at the eastern end of the Santa Monica Mountains. It supports the coastal sage shrub, chaparral, riparian and southern oak woodland plant communities that are typical in the interior mountain ranges of Southern California. What makes Griffith Park important is its geographical location. It has become an island of natural vegetation surrounded by urban and suburban development. These isolated areas are important in preserving and documenting the geographical variability of vegetation and wildlife that formerly occurred throughout the region. They serve as reservoirs of native species that could be of scientific and economic value in the future... in the case of Griffith Park this function is made even greater than might be expected because it serves as a corridor for any gene flow and species movement... between the Santa Monica and San Gabriel Mountains via the Verdugo Mountains.


Because of its relative seclusion, seasonal stream, mature tree canopy (including protected native species) and close proximity to the Park's higher, wilder reaches, the rare gray fox, as well as deer, bobcat, other mammals and avian species have been documented in the Old Zoo area. For example, in 2007, Griffith Park Natural History Survey biologists found "the distribution of the gray fox in Griffith Park appears to be restricted to a small area within the park. We found evidence of gray fox in only one localized area within the Old Zoo study area." In 2009, they recorded Griffith Park's "highest bat species diversity and detection frequency rates" in "the Central Area of the park (which includes the Old Zoo), where six species were found."

Negative impacts on wildlife from sound projecting towards the canyons and then echoing into the highest reaches above the Old Zoo must be considered. No doubt sound impacts are cumulative, considering Zoo events, Greek events, and Autry events.

Sound also shatters the peace for hikers, such as the Sierra Club night hikers who start out very near the Old Zoo area. Negative impacts fall upon other passive recreationists, including picnickers. Impacts on the current users include loss of a quiet experience, potential displacement, and congested traffic and parking.

Griffith Park is the place Angelenos come to leave the city behind. We are kindly presenting our current observations, asking that the appropriate level of review is completed. As currently proposed, we feel this project has sufficient potential negative impacts to warrant a review through a full Environmental Impact Report. Only then can we assure that the full impact of the project on Griffith Park and its many visitors has been disclosed.

Respectfully,

A handwritten signature in black ink, appearing to read "Gerry Hans", written over a horizontal line.

Gerry Hans
President



Friends of Griffith Park
P.O. Box 27573
Los Angeles, CA 90027-0573
friendsofgriffithpark.org

January 22, 2014

Paul Davis, Environmental Specialist
Department of Recreation and Parks
221 N. Figueroa Street, Suite 100
Los Angeles, CA 90012
Fax: (213) 202-2611

Re: PRJ20658 NG-13-404-RP
Griffith Park Outdoor Performing Arts Center
Proposition K

Dear Mr. Davis:

We submit these comments on behalf of Friends of Griffith Park (FoGP). Friends of Griffith Park is a non-profit charitable group concerned about the sustainability of Griffith Park as a regional park where nature can be enjoyed by future generations, and where the balance of recreational opportunities, the arts, and a thriving ecosystem must be met. For this reason, FoGP has been active and interested in the City's process to create a performing arts stage in the Old Zoo area of Griffith Park. The project is described as an open air outdoor stage measuring 45 feet by 45 feet on a landscaped grassy part of Griffith Park known as the Old Zoo area. The proposed project includes other ancillary improvements such as a new switchboard, resurfaced parking lot, improvements to existing restrooms, path lighting, resurfaced walkways, a new path and bridge meeting Americans with Disability Act (ADA) requirements, and under-grounding of an existing overhead power line. The land proposed for development is owned and managed by RAP.

The California Environmental Quality Act (CEQA) is intended to adequately inform the public and decision makers about the potential environmental impacts of a project and to provide alternatives and mitigation to lessen or eliminate those impacts, if they are found to be significant. (CEQA Guidelines § 15002; *Citizens of Goleta Valley v. Bd. of Supervisors* (1990) 52 Cal. 3d 553, 564; *Laurel Heights Improvement Ass'n of San Francisco v. Regents of the University of California* (1988) 47 Cal.3d 376, 392.) The mitigated negative declaration (MND) prepared for the Griffith Park Performing Arts Center Project contains numerous deficiencies that prevent it from complying with CEQA. The MND fails as an informational document, it is based upon premises that are contradicted by evidence in the record, and it fails to address the concerns submitted by FoGP during the scoping period. The MND grossly understates the negative impacts which may occur, and fails to explore the significance of those impacts including developing a full range of effective mitigation measures to lessen impacts as required by law. An MND is inappropriate for a project of this scale. A full EIR is required before the Project may be approved by the City, and such EIR must fully explore alternatives which will reduce these significant negative impacts.

I. The MND's Project Description is Inadequate.

A. At various public meeting the project was described as just a stage, "a platform." The use of the word "Center" in the documentation implies that the project is to be more than a simple platform stage, and indeed it is.

The proposed project is consistently described as a stage 45 feet by 45 feet. The backstage area is only mentioned twice and its dimensions of 45 feet by 30 are only given once. When the backstage area is included—as it must be—the area of the stage portion of the project is nearly doubled.

The project, no longer a platform, also now includes ornamental poles to support lights and stage sets. The overall height of the stage is now 26 to 28 feet. This is not what was initially proposed to the public at the Local Volunteer Neighborhood Oversight Committee (LVNOC) walk-through or during the initial LVNOC sessions. The scope of the project is a moving target even to this current date. Incomplete project descriptions, particularly of Phase 2, has prevented proper public disclosure and contributed to the failure to analyze and mitigate the environmental impacts.

B. The project area is described as on a grassy knoll (p. 1-9). A knoll is a small hill. The project site is exactly the opposite. It would more correctly be described as a basin, a bowl or a glen. This inaccuracy is important, as the project site's topography is important to an accurate analysis of the project's impacts, specifically with regard to noise and aesthetic impacts.

C. Because the Project is a stage whose purpose is to attract an audience, the entire area, the stage, the backstage, the lawn where the audience sits, the restrooms, pathways, parking lots, and the access must all be considered as part of the project. CEQA requires a lead agency to analyze the entirety of a project. The MND repeatedly states that the Old Zoo's WPA-built grottos are 200 feet south of project site. This is not correct. The WPA grottos are immediately adjacent to the project. Children frequently play in the old grottos while their parents watch the performance. The grottos are an integral part of the Project, and the MND must analyze any impacts on the grottos that the project may cause.

D. The Project Description is deficient because it does not make clear the primary purpose of the Project. The MND states:

The following objectives have been developed for the proposed project:

- Provide a permanent stage area to accommodate the existing known events that occur annually on the project site and allow for any other future events in a safe, orderly, and accessible location that can be monitored by RAP and permitted by the City.
- Provide improvements to allow for enhanced ADA -accessibility and access to the site.
- Maintain the natural landscape and minimize the disturbance of surrounding area as much as possible in order to remain in character with the historic designation of Griffith Park and in consideration of the natural wildlife areas in the site.

However it was clearly stated at all the LVNOC meetings that the purpose of the stage was to spare the two major users of the proposed project the expense and inconvenience of having to set up a portable stage. Symphony in the Glen is only scheduled to use the site for one night in September. Setting up a portable stage once a year most certainly impacts the area less than the negative impacts this large-scale project imposes.

Shakespeare in the Park plans to use the stage four nights a week from June 20 to Labor Day weekend. While the storage area provide convenience for equipment and prop protection, in the past most of the

sets have remained in situ during their season. Thus the set-up expense relates mainly to one pre-season set-up job and one post-season tear-down job. Therefore the relative negative environmental impacts comparing the proposed project to the current situation for the two groups is vastly worse.

E. The MND states that the project would promote free events. (p. 1-2) However a subtle but significant change in the adopted Griffith Park Vision was quietly made at the last minute in December, 2013. Referring to Independent Shakespeare Company plays p. 24 was changed from “are free of charge” to “can be attended free of charge.” This recognizes that if park users want to sit in the back, the plays would be free, but if park users want to sit in the front, they would pay. The Shakespeare in the Park events aren't as free as the company would like you to think. Thus, if the project is built and used for Independent Shakespeare Company plays, the City would be improperly using Proposition K funding to fund private entity projects in the park.

F. The MND also states that Shakespeare in the Park is a non-amplified event. It is likely that the MND's conclusions about noise and recreational impacts are based on the project's use for non-amplified events. However according to *LA Stage Times*, August 15, 2013, (Attached. Highlighted near the end of the article.) the Independent Shakespeare Company (ISC) plans to accommodate 5,000 attendees and will probably add floor miking so that people in the back can better hear performances. From their own description, the company plans to add amplified sound. Further, the project description states that while the current users of the Old Zoo area do not bring in amplified sound, future users may bring in amplified sound. The MND does not disclose, analyze, or mitigate the impacts of amplified sound. The noise, recreational, and biological impacts of amplified sound in this sensitive ecological area must be studied in an EIR prepared for the project.

G. At LVNOC meetings, Shakespeare in the Park people asked for a concession stand. The company's plan is clearly to expand the Old Zoo stage area into a full entertainment venue much like the Greek Theatre which is located approximately one mile southwest of the project. While the Greek is a large venue, it is located on the fringe of the park, not in a central wilderness area. Perhaps this level of activity would be better suited to another location in the city such as Grand Park downtown which already has a fully developed facility that is already ADA accessible and is looking for performers. An EIR would provide the City an opportunity to analyze alternatives to the project site that would avoid the potentially significant environmental impacts of placing a Greek Theatre-style venue in the Old Zoo area.

H. The number of parking spaces required for a new venue is usually based on the number of seats the venue holds. How has the City calculated the number of parking spaces required for this project, given that the MND does not disclose its capacity? Given the goal of attracting 5,000 attendees, FoGP suggests that the 5,000 attendee figure be used as a basis for determining parking requirements. Any smaller number would likely result in parking scarcity in the park.

II. The Project's Impact on Aesthetics is Significant.

The proposed project would be located in Griffith Park, in the eastern range of the Santa Monica Mountains. The project site is in the Old Zoo, which is part of the Green Park Corridor area of Griffith Park (RAP, 1978). The manicured lawn area of the project site has partial views of the Santa Monica Mountains to the north and west.

A. The MND reports that the project would “slightly alter the visual character of the project” (p. 2-5), but concludes that the project will not have significant aesthetic impacts. This assessment is incorrect. Since

there is currently no structure whatsoever in the central area of the project site, the addition of the stage structure will have a great impact on the aesthetics of the project site. It will become the dominant feature of the area. The bridge will be aesthetically obtrusive, unsightly and severely out-of-context with the surrounding natural environment. Arriving visitors will be looking directly at the rear of the stage, a six-foot wall, and the backstage area, when they enter the Old Zoo Picnic Grounds. The stage is located such that it is the very first thing visitors will see and will dramatically alter a visitor's first impression of the picnic area. The stage will also detract from the historic WPA grottos that are integral with the project site on its southern edge. An EIR is required to assess the project's significant aesthetic impacts on the historic Old Zoo site.

B. The MND relies upon the site's dense vegetation to screen views of the bridge and the stage from other areas of the park and for minimization of impacts to views within the Old Zoo site. However, the MND fails to acknowledge whether any of these trees will need to be removed during any site grading or during construction of the stage, bridge, or during undergrounding of the existing overhead power line, or if any trees will be affected.

C. Furthermore, since there is currently no lighting in the Old Zoo area, the addition of any lighting, however minimal, will have a great impact on the aesthetics of the project site, whether the lights are switched on or off. The MND contains no analysis or mitigation of the project's lighting impacts.

D. In addition to its large size, the stage structure itself, by its very nature, will be a graffiti magnet. Graffiti would have significant adverse aesthetic impacts, as well as adverse impacts on the recreational value of the site. Who will be responsible for seeing that the graffiti is removed promptly? Will each user of the stage be responsible for removing the graffiti? The Department of Recreation and Parks maintenance staff has been stretched so thin with the budget cuts that they cannot keep up with the removal of graffiti that occurs in the park now. They cannot possibly be expected to keep the new stage free of graffiti. Without enforceable mitigation that requires stage users or the Department to immediately remove graffiti, the new structures will have adverse impacts on aesthetics that must be analyzed in an EIR.

III. The Project's Impacts on Biological Resources Impacts are Significant.

The MND contains inadequate disclosure and analysis of biological resources at the site, understates the project's significant negative impacts, and fails to suggest adequate mitigation measures which can reduce those impacts. Without an adequate analysis, the likely adverse biological impacts on Griffith Park and the Santa Monica Mountains cannot be mitigated to a level below significant. An EIR is required.

A. The Old Zoo project site is a Significant Ecological Area. Yet information needed by the public is obscured by the following statement on P. 2-34, saying, "the majority of Griffith Park is within a Significant Ecological Area (SEA) 37; however the project site is 70 feet west of and outside of the SEA." Unless the MND meant to note that the proposed stage is "east" instead of "west" of the SEA border, it contains incorrect information. Also, the County has proposed new SEA borders that are even more proximal to the site than that of the current border. Even though the stage itself may not occur within the SEA border, the audience would be well beyond 70 feet of the stage. Since the purpose of the stage is to attract an audience, one must include the audience seating area as part of the project. The audience would be sitting within the zone of the SEA. Placing 2500 people in a SEA four nights a week throughout the summer months is not an appropriate use of a SEA and would intimate that there would be significant impacts on sensitive ecological resources that inhabit the area. According to *LA Stage Times*,

August 15, 2013, (See attached.) Shakespeare in the Park plans to increase its attendance from 2500 per event to 5000. The placement of 5000 people in and near the SEA on most summer evenings would have even greater impacts.

B. Sound impacts wildlife and is understated in the MND. Because of the expectations of larger audiences, a plan to install floor microphones to amplify the sound is already in place. The amplified sound would have a negative impact on the wildlife that rely on quiet evenings to locate prey or avoid predators. Larger, future events would add even more sound impact on wildlife. As the project does not limit the number of events that are permitted each year, the MND should have analyzed nightly impacts to species. Performers at the proposed project would bring their own equipment, which may be much louder than the equipment that is currently used for Old Zoo area performances. Sonic impact of this magnitude in an interior park wildlife area such as the Old Zoo not only has repercussions on various wildlife types, it may impact the entire ecosystem.

The rapidly growing problem of human-produced noise has initiated much scientific research relating to its effects on wildlife over the last couple decades. There is universal agreement that noise can affect an animal's behavior and physiology over a wide variety of species. When stressed by noise, an animal's reproductive success, energy budget, and long-time survival is jeopardized. The scientific literature documents avoidance and abandonment behavior, such as birds being flushed out of nests breaking eggs or exposing young to predators. Acoustical masking has been shown to interrupt species-specific signals across a wide range of wildlife. Man-made sounds probably affect animals in many other ways that we have not yet recognized. The MND fails to disclose, analyze, or mitigate these impacts. An EIR is required.

C. Light spillage from the site during events affects the project's adverse impacts on wildlife. Decades of scientific research has established that artificial nighttime lighting interferes with wildlife and habitat value. The introduction of nighttime lighting can interfere with predator-prey relationships, affect bird nesting behavior, as well as circadian and annual rhythms affecting wildlife behavior. The MND also fails to adequately consider the cumulative disruption to wildlife that would result from lighting the stage area, rest rooms, pathways, bridges and parking lot areas, in violation of CEQA. (See, *The Ecological Consequences of Artificial Night Lighting*, Travis Longcore and Catherine Rich, 2006.)

D. The Biological Technical Report is insufficient. Table 2-5, special-status species, fails to list Western Red Bat (*Lasiurus blossevillii*) and fails to cite the Griffith Park Bat Survey of 2009 (Remington-Cooper), where three special-species bats were confirmed in the general Old Zoo area itself. The reconnaissance conducted for this MND was at an opportune time (December) to find no evidence of bats. The MND ignores scientific work that confirms presence of the bats. According to the Remington-Cooper study, the "highest bat species diversity and detection frequency rates were in the Central Area of the park where six species were found." Central Area surveys were mostly conducted at the Old Zoo. Accordingly, an EIR should be prepared that discloses, analyzes, and mitigates any threats to special status bat species that frequent the Old Zoo area.

E. Stated mitigation measures for bats and nesting raptors are inadequate, impossible and/or impractical. For example, raptors regularly nest in the Old Zoo area. Given the size of the project area, FoGP wonders if a 500-foot buffer is even possible during construction. More important, the MND contains no mitigation measures for nesting raptors after construction is complete. Why not? The permanent disturbance from 2500-5000 people may be more disruptive to foraging or nesting raptors than the temporary disturbance of construction. Finally, the suggested mitigation of a

buffer during event periods seems both impossible and impractical. If a buffer is to be established during event periods, more information on such a buffer is required so that its efficacy may be evaluated.

F. The MND understates use of this area by wildlife and its importance to connectivity. The Biological Technical Report fails to cite Mathewson-Spehar (2007), "the distribution of the gray fox in Griffith Park appears to be restricted to a small area within the park. We found evidence of gray fox in only one localized area within the Old Zoo study area." The rarity of gray fox in this section of the Santa Monica Mountains makes this transitional wildlife corridor worth saving. Because of this area's relative seclusion, seasonal stream, mature tree canopy and close proximity to the Park's higher reaches, the rare gray fox, as well as deer, bobcat, a mountain lion and other mammals, plus many important avian species have all been documented in the Old Zoo area.

G. The negative biological impacts of a new large bridge and paths is not explored as part of the MND and the Biological Technical Report. The impacts on an ephemeral stream, multiple construction risk impacts, and wildlife movement are all subjects not disclosed or analyzed. Phase II must be considered as part of the project, per CEQA.

IV. The Project's Impacts on Cultural Resources Impacts are Significant.

A. Although the Cultural Resources Report mentions some of the historic personages who were included in Griffith Park's Historic-Cultural Monument Application, the report failed to note Park Superintendent Frank Shearer who had a great influence on how Griffith Park looks today and whose vision of a zoo in the park was implemented in what is now referred to as the Old Zoo. In January 1910, the Parks Department hired the young Scotsman, who was trained at the Royal Botanical Gardens of Edinburgh, as a landscape engineer and draftsman. The Department was so impressed with his skill that by May of the same year, Shearer was named acting Superintendent and soon after became Superintendent. It was he who had the idea to convert Fern Dell's stream-fed ravine into a setting for exotic and native ferns. Fern Dell became one of the most popular places in Los Angeles to visit in the 1920s and 1930s. It was also Shearer who had the vision for a zoo in Griffith Park. The following quote from Shearer was in the *Los Angeles Herald* on October 11, 1910.

There Is a splendid opportunity for the Introduction and maintenance of a zoo of magnificent proportions, as there are canyons and slopes of every Imaginable size, shape, aspect and climatic conditions. The necessary barriers for the various species that comprise the zoo could be skillfully concealed among the trees and shrubs growing on the different slopes, giving to the visitor the Impression that the Inhabitants of the zoo have each selected a habitat and are there through natural inclination.

Legendary Parks Superintendent Shearer started the construction of his vision for a Zoo in 1913. The bear pits were built by 1200 unemployed men in 1914. Yet he gets no credit in the Cultural Resources analysis. His importance to Griffith Park continued through the twenties and thirties, and he was present in the field the day of the 1933 Great Fire that killed 33 WPA workers. The MND's omission of information about Frank Shearer deprives the cultural analysis of critical information.

B. The MND is deficient in its analysis of the WPA projects in the Old Zoo and downplays the importance of these WPA projects. During the Great Depression, the WPA created new elk and deer

paddocks, new lion and bears grottos, and other zoo buildings. The analysis did not even include the WPA project plans that are in the Department of Recreation and Parks own archives and are readily available. They have plans for WPA Project 1713 File 10-38 (398), October 29, 1936, for the large and small bear grotto in the Griffith Park Zoo. (See attached.) Friends of Griffith Park has requested that the Department scan these plans and send them to you to be added to the project file.

The Cultural Resources report made no attempt to get the complete files on the WPA work in the Old Zoo. Some of these records are available in the San Francisco office of the National Archives and Records Administration. Most of the records are housed in the Archives Reference Section (NWCT2R), National Archives and Records Administration, 8601 Adelphi Road, College Park, MD, 20740-6001. (301) 837-3510. <http://www.archives.gov/contact/inquire-form.html>.

While the project does not plan to touch these historic WPA grottos, it will certainly change the aesthetics of the site. The first impression visitors, picnickers and hikers currently have when they walk up the steep path or take the stairs is a broad open view of the entire site. The wonderful work of the WPA grottos is immediately visible as is the entire glen with a view up to Bee Rock. It is exactly as Frank Shearer imagined it to be in his interview with the Los Angeles Herald in 1910. "...giving to the visitor the *Impression that the Inhabitants of the zoo have each selected a habitat and are there through natural inclination.*" With the addition of the stage and the backstage area right at the top of the path, visitors will now be looking at a six-foot wall 45 feet long with 28-foot poles on top of it. One of the designers said it would look like a garage door. This represents a drastic change in the aesthetics of the charming Old Zoo Picnic Area, with impacts to its historical nature. One must remember that during the day this is a popular picnic area. Picnickers will be greatly impacted by the change in the aesthetics of the picnic area.

The Old Zoo area also contains important Civilian Conservation Corps projects of historic and cultural significance. CCC projects in Griffith Park were under the supervision of Louis Brandt, Associate Landscape Architect. CCC workers were housed at Griffith Park Camp, WC-2. They constructed "excellent stone lined drainage channels." (Source: monthly narrative reports by Louis Brandt.) Some of these drainage channels are located in the Old Zoo area and continue to function well today.

C. The Cultural Resources report neglected to mention that the idea for a zoo in the Park dates to 1896. Col. Griffith co-owned an Ostrich Farm located in Park Center, in the same general area as the Old Zoo. The 1896 Ostrich Farm featured a small collection of birds, a menagerie, trails, and an elaborate picnic area. It was from this small menagerie at the Ostrich Farm that Col. Griffith developed the idea for a zoo in Griffith Park. This omission is important as it confirms that even at the time Col Griffith donated land to the City, a public zoo was already on the drawing board. The Old Zoo is a memorial to a major goal to provide a natural setting for the public to gather to view animals from around the world.

D. While the Cultural Resources report includes the founding of missions and of the City of Los Angeles in 1781 seven miles away, it failed to mention the Juan Bautista de Anza Expedition of 1775. The members of the expedition walked along the Los Angeles River where it passes through Griffith Park. They camped at the bend in the river where the Zoo and the Autry Museum are currently located. Because of the size of the expedition, they would have walked through the lower part of the Old Zoo where the bridge is to be constructed. One of the soldiers on the Anza expedition was Jose Vicente Feliz who later received Rancho Los Feliz. The Feliz Adobe built in 1853, City of Los Angeles HCM # 401, declared November 30, 1988, is situated just east of the project site. The project's aesthetic impacts would reduce the cultural value of the site, a significant impact that requires analysis in an EIR.

V. The Noise Report is deficient and inaccurate.

A. The noise report is based on the fact that the proposed uses -- Shakespeare in the Park, Symphony in the Glen, and Haunted Hayride -- already exist in the Old Zoo area so the noise level would not increase substantially. The report omits the fact that no evaluation of the impacts of these uses was undertaken *before* they were allowed in the park. Therefore there is no record of the impact these events have already had on the tranquility of the project site. The baseline for CEQA analysis should be the Old Zoo area without a performance space or the Haunted Hayride event.

While the Old Zoo is a popular picnic area in the daytime, in the evening it used to be relatively free of human presence. This is no longer true during the summer and fall. In fact, complaints of echoing sound through the nearby canyons have been made by hikers, especially during the Haunted Hayride event period. The introduction of noise into an area people visit specifically to find tranquility is a significant noise impact as well as a significant recreational impact that must be studied and mitigated under CEQA.

A study should be made of the noise levels on a winter or spring evening when events are not scheduled. This would provide a baseline noise level from which to evaluate the true noise impacts these events have in the park. The fact that a noise analysis was not done when it should have been done, prior to permitting performances in the park, is no excuse for not doing it now. Baseline noise levels must be based upon noise before any of the three events were instituted.

The MND admits that "the stage could alter the perceived tranquility of the natural areas immediately surrounding that are used for passive recreation (picnicking, hiking and wildlife observation) while in use due to noise and potentially increased audience during the performance." (P. 2-57 "Perceived tranquility" is a strange choice of words given that the Old Zoo is very tranquil in the evening when there is no performance. It further admits that future events could have amplified sound. With performers bringing in their own sound equipment, RAP may have little to no practical control over the decibel levels during performances.

According to *LA Stage Times*, August 15, 2013, (See attached, highlighted at the end of the article.) Shakespeare in the Park plans to increase its attendance from 2500 per event to 5000. Because of the increased audience, they also plan to install floor microphones to amplify the sound so that people in the rear can hear. This increase in noise level was not evaluated and must be.

During construction, particular attention must be paid to noise levels because of the sensitive receptors in Shane's Inspiration Playground, which is specifically designed to serve handicapped children. Studies have shown that children are more sensitive to noise, and adequate mitigation must be developed if Shane's Inspiration Playground will be impacted.

VI. The Recreation Report Is Deficient.

A. Throughout the MND the proposed recreational activities are described as already existing. This is used to justify statements that the project will not increase noise, traffic, or any other potential project impacts. Then on p. 2-48, the MND states that "Although that target year has passed, the project nonetheless serves the purpose of creating new recreational activities for the City, which would be consistent with goals of the plan. Therefore, this impact would be less than significant." The MND cannot state both that these recreational activities already exist and that it creates new recreational activities. Either way, the MND relies upon a flawed baseline for impact analysis.

The MND recognizes the nearby Greek Theatre, LA Zoo, and Autry National Center (p.1-6.) They all have performance centers as does the Visitor Center and other venues in Griffith Park. The Autry is also planning an outdoor stage on its lawn.

Given the availability of numerous nearby venues, is there a need for another stage in Griffith Park? Perhaps a performing arts stage would be better suited in a city park that has no stage to provide recreational opportunities to those neighborhoods that are lacking in recreational activities. Alternative locations to better serve the public and to reduce environmental impacts should be explored in an EIR.

B. The proposed stage has the potential to displace picnickers who have enjoyed the use of the Old Zoo during the day for picnicking since the 1960s. The current performers use the area in the evening and early evening. However there is nothing in the proposed project that restricts a performer's use of the stage during the day or that limits the number of events in a day, week, month, or year. This has great potential to eliminate the Old Zoo site as a picnic area entirely.

Picnickers and hikers, including Sierra Club hikers, are already displaced from the site during the Haunted Hayride. Besides being displaced during the entire month of October while the Haunted Hayride is going on, they are also restricted from the area for approximately two weeks before the Haunted Hayride while it is being set up and for approximately two weeks after the event for tear down and load out. The facility is already unavailable to picnickers for 1/6 of the year.

The MND states that RAP "would only permit new uses that would not substantially deteriorate the existing project environment or its surroundings in Griffith Park." (P. 2-77) This is an entirely disingenuous statement given that RAP has permitted the Los Angeles Haunted Hayride to operate for several years in spite of the damage done to the environment. They have covered much of the "manicured grassy area" leaving it bare and subject to erosion.

Phase 2 of the project requires the construction of a bridge to meet the requirement for ADA access to the new stage. The bridge as currently proposed cuts across the existing picnic area in the lower Old Zoo Picnic Area. This will limit the use of the area to smaller groups. Larger groups' space would be cut in half by the bridge. The MND also fails to acknowledge or mitigate the cumulative impact this project will have on large group picnicking if the Crystal Springs Ballfields project eliminates other large group picnic sites in Crystal Springs.

C. Conversion of regular park patron parking to ADA parking (unspecified number at this time) may decrease the regular accessibility to picnic grounds at times when performance events are not occurring. Depending upon the number of required ADA spaces, a large amount of the current proximate parking spaces may need to be converted. If replacement spaces are not provided, parking and traffic may also adversely impact recreational use of the Old Zoo area.

VII. The Transportation and Traffic Report is Inadequate and Deficient.

A. The Traffic Report is based on the fact that the proposed use (Shakespeare in the Park, Symphony in the Glen, and Haunted Hayride) already exists in the Old Zoo area so the traffic level would not increase substantially. Again, the report fails to acknowledge that no evaluation of the impact of these uses was undertaken *before* they were allowed in the park. Therefore there is no record of the impact these events

have already had on the traffic levels. The evaluation of the impact of traffic needs to be based on the evening traffic that existed in the area *before* these uses arrived.

B. According to *LA Stage Times*, August 15, 2013, (See attached.) Shakespeare in the Park plans to increase its attendance from 2,500 per event to 5,000. The Traffic Report did not take into consideration an evaluation of the impact on traffic when the number of attendees is doubled. Such an evaluation should occur in an EIR.

C. The possible future events added to the three existing events is unknown. However since there will certainly be additional events at the site, and since no limits on project use are included in the project, the report must include them in an evaluation of the impact on traffic.

Conclusion

As detailed above, the proposed performing arts stage project will have significant impacts on the Old Zoo area that require preparation of an Environmental Impact Report. FoGP looks forward to working with the City to ensure that Griffith Park is properly managed to protect its unique cultural, recreational, and biological resources.

Sincerely,



Gerry Hans
President
gerry@friendsofgriffithpark.org

Attachment #1 (following page): *LA Stage Times*, August 15, 2013

Note: Old Zoo plans, including WPA drawings, to be sent by RAP Planning Division.

LA STAGE TIMES

ISC Grows New Theatergoers in Griffith Park With 'Free' Shakespeare

by Evan Henenson | August 15, 2013

In the middle of July, Tal Josef went to Griffith Park to see a production of the Independent Shakespeare Company.

The name of the play? "I don't remember," she admits. "I didn't really pay attention." Which draws a laugh from her boyfriend and fellow restaurant worker Kyle Jordan. "She had come back from the play, and said 'I think we have something to do on a Sunday night, a great date night experience for us. They do Shakespeare in the park in Griffith,'" recalls Jordan. "I said, 'OK, what did you see?' She said, 'I don't know.' I said, 'What are they going to show next time?' She said 'I don't know.' I said 'Do you want to go again?' She said, 'Yes, I do. Very much.'"

Let the record reflect that Josef went solo to ISC's Griffith Park Free Shakespeare Festival, but took in the only non-Bard offering in the three-play repertory — Oliver Goldsmith's *She Stoops to Conquer*. She brought Jordan back for a Sunday night performance of Shakespeare's *Macbeth*, but really the night's bill of fare was largely beside the point.

"I liked the vibe, the atmosphere. It was calming. Nice," says Josef.

Josef and Jordan's tale is not atypical among the ever-expanding crowds who make their way to the site of the Old Griffith Park Zoo during the 10 weeks from June to September, when ISC is performing. They park near the Shane's Inspiration playground — if they're early enough to still nab a space — or farther away by the carousel if the lots are jammed. They follow the burgundy-and-white-arrowed signs directing them to "Free Shakespeare" and trudge up a hill to a grassy, open-air glen, where a simple stage is erected every summer. They bring folding chairs, blankets and every imaginable variety of snacks or picnic provisions. They come with babies, dogs and friends from out of town. They don't have tickets because — unless you want to carve out some prime reserved seating obtained through Goldstar Events — you don't need one. Admission is free. No one is turned away.

Some stumble in after hearing about the activity during a nature hike. Others might be in the park for another reason, hear the noise and stop by — occasionally even in mid-performance — to check things out.

Others plan. Two years ago, Jonathan Lee and his wife Yvette brought their then-10-year-old twins Ronen and Keren to an ISC production of *Hamlet*. Returning this year for *Macbeth*, they again prepared by reviewing the plot with their kids.

"After *Hamlet*, I posted on Facebook and Yelp. I was really enthusiastic about it," says Jonathan Lee, a librarian. "It's a great introduction. The fact that you're outdoors is a benefit, and it doesn't in any way detract from the experience. You're not in a formal theater setting."

While some ISC patrons are regular Los Angeles theatergoers who may subscribe to Center Theatre Group or the Pasadena Playhouse, many say the last time they went to a live staged performance before ISC was in high school. Now they can't get their fill of ISC's unique, all-inclusive brand of free Shakespeare.

And they come back, often to see the same play multiple times during the same season. Some come late. Others leave early. Still others stay to mingle and chat up cast

March 16, 2014

Ms. Lynn Alvarez, President
Los Angeles City Recreation and Parks Department
Office of Board of Commissioners
221 N. Figueroa St. Suite 1510
Los Angeles, CA 90012

Re: **Opposition to Agenda Item 14-056 (March 19 Agenda)**
Opposition to Agenda item 14-061 (April 2 Agenda)
Opposition to Agenda Item 14-062 (April 2 Agenda)

Dear President Alvarez:

The referenced agenda items continue and accelerate a policy of increased commercialization in Griffith Park.

Item 14-056 concerns the Halloween Event. In your discussion on March 5, 2014 about this item, almost ALL of the discussion concerned how much the City will receive from the contractor. No one claimed to know how much revenue had been generated by last year's Haunted Hayride event.

There was NO discussion about any of the following:

- The appropriateness of using the park to promote adult themed events
- The displacement of myriad mostly low income passive users of the Old Zoo area
- The myriad wildlife which will be affected by noise, traffic, and lighting caused by the event

Item 14-061 concerns the installation of baseball fields in the Crystal Springs picnic area. In the Report of General Manager, it notes that "the project would result in significant environmental impacts related to aesthetics, biological resources, cultural resources (includes historic, archaeological and paleontological resources), and noise." But then the report admits that "no feasible mitigation measures were identified...significant impacts ...would be **adverse and unavoidable.**" (emphasis added).

Later in the report, it states that "the statement of overriding considerations explains in detail why the social, economic, legal, technical or other beneficial aspects of the project outweigh unavoidable, adverse environmental impacts, and why the lead agency is willing to accept such impacts."

In considering the "social" impacts, is the displacement of mostly low income and passive users of the picnic area addressed? Here again, I note that "economic" considerations (I assume Rec & Parks receives a little cash from the ballfields users) trump all else. Turning Griffith Park into a cash register seems to be your overriding concern.

Item 14-062 concerns installation of a permanent Performing Arts Center in the Old Zoo picnic area. It is not *adjacent* to the Old Zoo picnic area, as is stated in the general manager's report. In the general manager's report **there is not one word** about the displacement of mostly low income passive users of the Old Zoo picnic area. **There is not one word** about year round increase in noise, traffic, lighting, and the impact on wildlife. Furthermore, the construction of such permanent edifice is inconsistent with the urban wilderness character of Griffith Park, and it ignores the cultural, historic status of Griffith Park.

There is no need to build a permanent stage. A temporary stage has worked well in recent years.

Taken together, the three proposals continue the slicing and dicing of the relatively scarce, flat or gently sloping areas within Griffith Park suitable for picnicking and other passive activities. The proposed ballfields will carve out a significant section of the Crystal Springs picnic area, the permanent stage carves out a section of the Old Zoo picnic area, and the Halloween event (aka Haunted Hayride) takes the Old Zoo picnic area completely out of service as a picnic area for over a month each year.

All three of these misguided proposals continue proceeding on the slippery slope of commercialization of Griffith Park. **This is not what parks are supposed to be about!**

The Commission should reconsider all three of these proposals and address the cumulative, adverse impact of these proposals on wildlife, passive users of picnic areas, and cultural, historic aspects of Griffith Park.

Regards,

Joseph F. Young
C-chair, Griffith Park Task Force
Sierra Club – Angeles Chapter

Copies:

Vice President Iris Zuñiga
Member Kafi D. Blumenfield
Member Sylvia Patsouras
Member Misty M. Sanford

ATTACHMENT 3

4730 N Griffith Park Dr

Permit Application #: 14010 - 10000 - 00455

City of Los Angeles - Department of Building and Safety

Plan Check #: B14LA02109FO

Bldg-New

14010 - 10000 - 00455

Commercial

Plans Filed in: METRO

Regular Plan Check

Printed On: 07/31/14 10:43:17

CLEARANCE SUMMARY WORKSHEET

IMPORTANT: This summary documents the clearance(s) required prior to permit issuance. Most clearance(s) are granted electronically, however this form will also be completed so that in the event of a computer outage, there is evidence of the clearance action(s). Keep this form with all other documents necessary to obtain the permit.

INSTRUCTIONS

APPLICANT / REPRESENTATIVE: You are advised to initiate the approval process for the following permit application clearance(s) marked as "Not Cleared" as soon as possible. The time to obtain approval from some departments (such as the City Planning Department) may be time-consuming. The address and phone number of the specific agency corresponding to the "Address Code:" shown for each clearance is indicated at the end of this form and it is recommended that you call before appearing in person. Remember to bring a copy of the permit application to the clearance agency for their reference. A "Cleared" condition requires no further action on your part.

CLEARANCE AGENCIES: For city agencies, perform electronic clearance action(s) using PCIS and complete this form. For non-city agencies or PCIS outages, complete this form.

Description of Work: CONSTRUCT NEW OUTDOOR STAGE: ABOVE THREE (3) STORAGE ROOMS (OF OVERALL DIMENSION 12'-6" X 26'-6"), WITH BACKSTAGE AREA (OF OVERALL DIMENSION 61' X 76'), AND PATH OF TRAVEL TO (E) RESTROOM. INSTALL NEW 600A SWITCHBOARD.

Building & Safety Contact
Plan Check Office: METRO
PC Engineer: Bidyut Rath

Status

Clearance Description and New Status

Agency: Bureau of Engineering
Address Code: 1
Description: New or unrecognized address

Cleared

Electronic Clearance By (User ID): RSOUTHER Date: 06/19/14 Phone: _____
Comments: 5381 n griffith park dr address 1.25 mi north west of 4730 n crystal springs drive location on navigate

Cleared

Agency: Bureau of Engineering
Address Code: 1
Description: Verify street classification (Standard or Substandard) & improvement/dedication requirements per Hillside Ordinance
Electronic Clearance By (User ID): JMORALEZ Date: 06/16/14 Phone: _____
Comments:

Cleared

Agency: Bureau of Engineering
Address Code: 1
Description: Verify continuous paved roadway is 28 ft minimum, from driveway apron to boundary of Hillside Area per Hillside Ordinance
Electronic Clearance By (User ID): JMORALEZ Date: 06/16/14 Phone: _____
Comments:

Cleared	<p>Agency: Bureau of Engineering Address Code: 1 Electronic Clearance <input checked="" type="checkbox"/> By (User ID): JMORALEZ Date: 06/16/14 Phone: _____ Comments: _____</p> <p>Description: Verify continuous paved roadway is 20 ft minimum but < 28 ft, from driveway apron to boundary of Hillside Area per Hillside Ordinance</p>
Cleared	<p>Agency: Bureau of Engineering Address Code: 1 Electronic Clearance <input checked="" type="checkbox"/> By (User ID): JMORALEZ Date: 06/16/14 Phone: _____ Comments: _____</p> <p>Description: Verify street(s) at lot frontage(s) are 20 ft minimum per Hillside Ordinance</p>
Cleared	<p>Agency: Bureau of Engineering Address Code: 1 Electronic Clearance <input checked="" type="checkbox"/> By (User ID): JMORALEZ Date: 06/16/14 Phone: _____ Comments: NO SFC DUE ON SITE SEWER</p> <p>Description: Verify sewer connection for dwellings located 200 feet or less from a sewer mainline (per the Hillside Ord.-12.21A17(g))</p>
Cleared	<p>Agency: Bureau of Engineering Address Code: 1 Electronic Clearance <input checked="" type="checkbox"/> By (User ID): JZHANG Date: 06/30/14 Phone: _____ Comments: No storm drain or easement per new address 5381 N. Griffith Park Drive.</p> <p>Description: Site drainage to a storm drain easement</p>
Not Cleared	<p>Agency: Bureau of Engineering Address Code: 1 Electronic Clearance <input type="checkbox"/> By (User ID): _____ Date: _____ Phone: _____ Comments: \$125 NEED IDO</p> <p>Description: The fee authorized by Ord. 176,300 for PW/Eng to process clearance(s) for LADBS issued permits <input type="checkbox"/> Outage - Print Name/Initial: _____</p>
Cleared	<p>Agency: Bureau of Engineering Address Code: 1 Electronic Clearance <input checked="" type="checkbox"/> By (User ID): JMORALEZ Date: 06/16/14 Phone: _____ Comments: _____</p> <p>Description: Roof and/or site drainage to street</p>
Cleared	<p>Agency: Bureau of Engineering Address Code: 1 Electronic Clearance <input checked="" type="checkbox"/> By (User ID): JMORALEZ Date: 06/16/14 Phone: _____ Comments: NO SFC DUE EX ON SITE SEWER</p> <p>Description: Sewer availability and connection</p>

Cleared	<p>Agency: City Planning Department Address Code: 2 Electronic Clearance <input checked="" type="checkbox"/> By (User ID): L.GIESSIN Date: 06/11/14 Phone: _____ Comments: _____</p> <p>Description: Addition/Alteration/Demolition of City Historical Cultural Monument, Contact Lambert Giessinger at 213 978 1183, or Edgar Garcia at 213 9878 1189</p>
Cleared	<p>Agency: City Planning Department Address Code: 2 Electronic Clearance <input checked="" type="checkbox"/> By (User ID): L.GIESSIN Date: 06/11/14 Phone: _____ Comments: _____</p> <p>Description: Historic Preservation Overlay Zone per 12.20.3 G</p>
Cleared	<p>Agency: City Planning Department Address Code: 2 Electronic Clearance <input checked="" type="checkbox"/> By (User ID): L.GIESSIN Date: 06/11/14 Phone: _____ Comments: _____</p> <p>Description: Miscellaneous Approval for: The site designated as Historic Landmark. Approval per conditional use 12.24.U.19, and 12.24 is required (12.04.05 B 1 (b) (1) & (2))</p>
Cleared	<p>Agency: City Planning Department Address Code: 2 Electronic Clearance <input checked="" type="checkbox"/> By (User ID): MPRZEKOP Date: 06/17/14 Phone: _____ Comments: The subject case approving water storage tanks in the OS zone does not apply to the subject application or location.</p> <p>Description: Zoning Administrator Case #: ZA-1999-828-ZA1</p>
Cleared	<p>Agency: City Planning Department Address Code: 2 Electronic Clearance <input checked="" type="checkbox"/> By (User ID): MPRZEKOP Date: 06/17/14 Phone: _____ Comments: Case does not apply to subject scope of work.</p> <p>Description: Zoning Administrator Case #: ZA-22237</p>
Cleared	<p>Agency: City Planning Department Address Code: 2 Electronic Clearance <input checked="" type="checkbox"/> By (User ID): MPRZEKOP Date: 06/17/14 Phone: _____ Comments: The proposed application to add a stage for existing summer programs and storage/bathrooms upgrade and its regulations do not derive from the HCPU. This clearance is made pursuant to Paragraph 5 of ZI 2433- Revised.</p> <p>Description: Zoning Information File #: Hollywood Community Plan Injunction</p>
Not Cleared	<p>Agency: Department of Building and Safety Address Code: 4 Electronic Clearance <input type="checkbox"/> By (User ID): _____ Date: _____ Phone: _____ Comments: _____</p> <p>Description: Approval of Disabled Access corrections</p> <p style="text-align: right;"><input type="checkbox"/> Outage - Print Name/Initial: _____</p>

Cleared	<p>Agency: Department of Building and Safety Description: GPI is required unless a waiver is obtained from Grading Section</p> <p>Address Code: 4</p> <p>Electronic Clearance <input checked="" type="checkbox"/> By (User ID): PMISCHLI Date: 06/17/14 Phone: _____</p> <p>Comments: See soils report #83164</p>
Not Cleared	<p>Agency: Department of Building and Safety Description: Approval for Green Building - Mandatory Compliance</p> <p>Address Code: 4</p> <p>Electronic Clearance <input type="checkbox"/> By (User ID): _____ Date: _____ Phone: _____ <input type="checkbox"/> Outage - Print Name/Initial: _____</p> <p>Comments: _____</p>
Not Cleared	<p>Agency: Los Angeles Fire Department Description: Hydrants and access around building</p> <p>Address Code: 5</p> <p>Electronic Clearance <input type="checkbox"/> By (User ID): _____ Date: _____ Phone: _____ <input type="checkbox"/> Outage - Print Name/Initial: _____</p> <p>Comments: _____</p>
Not Cleared	<p>Agency: Los Angeles Fire Department Description: Approval for: VHFHSZ</p> <p>Address Code: 5</p> <p>Electronic Clearance <input type="checkbox"/> By (User ID): _____ Date: _____ Phone: _____ <input type="checkbox"/> Outage - Print Name/Initial: _____</p> <p>Comments: _____</p>
Not Cleared	<p>Agency: Los Angeles Fire Department Description: Title 19 building/structure</p> <p>Address Code: 5</p> <p>Electronic Clearance <input type="checkbox"/> By (User ID): _____ Date: _____ Phone: _____ <input type="checkbox"/> Outage - Print Name/Initial: _____</p> <p>Comments: _____</p>

End of Clearance(s) for 14010 - 10000 - 00455. Refer to "ADDRESS CODES" sheet for clearance agency address/phone information.